

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
NATALIE ALLEN,

Plaintiff,

-against-

CITY OF NEW YORK and POLICE OFFICER
CHRISTOPHER BURTON,

Defendants.
-----X

Index No.:
Date Filed:
LD No: 2014PI014205

VERIFIED COMPLAINT

Plaintiff, NATALIE ALLEN, by her attorneys, WEISS & ROSENBLOOM, P.C.,
complaining of Defendants, respectfully alleges, upon information and belief, that on or about April
14, 2014, at approximately 3:55 PM, in front of 1844 Brooklyn Avenue, in the County of Kings,
City and State of New York:

AS AND FOR A FIRST CAUSE OF ACTION

1. The cause of action alleged herein arose in the County of Kings, City and State of New York.
2. Defendant, CITY OF NEW YORK, is a municipal corporation organized and existing under
and by virtue of the laws of the State of New York.
3. Plaintiff, NATALIE ALLEN, has duly complied with all the conditions precedent to the
bringing of this action and in particular, has, on May 1, 2014 and within the time prescribed by law,
duly served upon defendant, CITY OF NEW YORK, a Notice of Intention to Make Claim stating,
among other things, the time when and place where the injuries and damages were sustained, and
more than thirty (30) days have elapsed since the presentation of said notice of claim, and such claim
remains unadjusted and unpaid, and thereafter, and within the time provided by law, this action was
commenced.

4. On July 1, 2014, a hearing pursuant to General Municipal Law 50-h was conducted.
5. This action is being commenced within one year and ninety days after accrual of this cause of action, or within the time allowed by law.
6. At all times herein mentioned, plaintiff, NATALIE ALLEN, was the owner and operator of a 2003 Suzuki motor vehicle bearing New York license plate number FYW4284 ("Vehicle No. 1").
7. At all times herein mentioned, defendant, CITY OF NEW YORK, was the owner of a 2009 Chevrolet motor vehicle bearing New York license plate number EVK3974 ("Vehicle No. 2").
8. At all times herein mentioned, defendant, POLICE OFFICER CHRISTOPHER BURTON, was the operator of Vehicle No. 2.
9. At all times herein mentioned, defendant, POLICE OFFICER CHRISTOPHER BURTON, was operating Vehicle No. 2 with the express and/or implied permission and consent of defendant, CITY OF NEW YORK.
10. At all times herein mentioned, defendant, POLICE OFFICER CHRISTOPHER BURTON, was an agent, servant and/or employee of defendant, CITY OF NEW YORK.
11. At all times herein mentioned, defendant, POLICE OFFICER CHRISTOPHER BURTON, was operating Vehicle No. 2 within the scope of his employment with defendant, CITY OF NEW YORK.
12. On the aforementioned date and time, at the aforementioned location, Vehicle No. 2 was in contact with Vehicle No. 1.
13. As a result of the aforesaid contact, plaintiff, NATALIE ALLEN, was injured.
14. The aforesaid occurrence was caused wholly and solely by reason of the negligence of defendants, CITY OF NEW YORK and POLICE OFFICER CHRISTOPHER BURTON, without any fault or negligence on the part of plaintiff, NATALIE ALLEN, contributing thereto.

15. By reason of the foregoing, plaintiff, NATALIE ALLEN, was caused to sustain serious injuries and a resultant loss therefrom.

16. Plaintiff, NATALIE ALLEN, sustained serious injuries as defined in Subdivision d of §5102 of the Insurance Law-Recodification.

17. Plaintiff, NATALIE ALLEN, sustained serious injuries and economic loss greater than basic economic loss as to satisfy the exceptions of §5104 of the Insurance Law.

18. This action falls within one or more of the exceptions as set forth in CPLR §1602.

19. By reason of the foregoing, plaintiff, NATALIE ALLEN, has been damaged in an amount exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

AS AND FOR A SECOND CAUSE OF ACTION

20. Plaintiff, NATALIE ALLEN, repeats, reiterates and realleges each and every allegation contained in paragraphs 1 through 19 above, with the same force and effect as if set forth more fully at length herein.

21. Solely as a result of the negligence, carelessness and recklessness of defendants, CITY OF NEW YORK and POLICE OFFICER CHRISTOPHER BURTON, plaintiff, NATALIE ALLEN, sustained property damage to Vehicle No. 1 and loss of use and has been damaged in the sum of Ten Thousand Dollars (\$10,000.00).

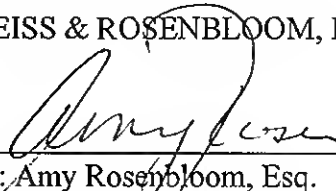
WHEREFORE, plaintiff, NATALIE ALLEN, demands judgment on the First Cause of Action against defendants, CITY OF NEW YORK and POLICE OFFICER CHRISTOPHER BURTON, and each of them, in an amount exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction; plaintiff, NATALIE ALLEN, demands judgment on the Second Cause of Action against defendants, CITY OF NEW YORK and POLICE OFFICER CHRISTOPHER

BURTON, and each of them, the sum of Ten Thousand Dollars (\$10,000.00); together with the costs and disbursements of these actions.

Dated: New York, NY
July 21, 2014

Yours, etc.,

WEISS & ROSENBLUM, P.C.



By: Amy Rosenbloom, Esq.
Attorneys for Plaintiff
NATALIE ALLEN
27 Union Square West
Suite 307
New York, NY 10003
(212) 366-6100

VERIFICATION

Amy Rosenbloom, an attorney duly admitted to practice before the Courts of the State of New York, affirms under penalty of perjury as follows:

I am a member of Weiss & Rosenbloom, P.C., attorneys of record for NATALIE ALLEN, plaintiff in the within action. I have read the contents of the foregoing COMPLAINT and know the contents thereof; the same is true to my own knowledge, except as to those matters said to be upon information and belief and as to those matters, I believe them to be true. My belief as to all matters not stated upon my knowledge are as follows: file maintained by Weiss & Rosenbloom, P.C. and information supplied by the client. This verification is made by me because plaintiff resides in a county other than the county in which my office is located.



Amy Rosenbloom

Affirmed July 21, 2014

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NATALIE ALLEN,

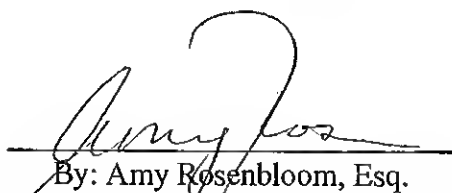
Plaintiff,

-against-

CITY OF NEW YORK and POLICE OFFICER
CHRISTOPHER BURTON,

Defendants.

SUMMONS AND VERIFIED COMPLAINT


By: Amy Rosenbloom, Esq.

WEISS & ROSENBLUM, P.C.

Attorneys for Plaintiff(s)

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Suite 307

New York, NY 10003

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